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1 UNITED STATES DISTRICT COURT 1 of 1 pages
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 UNITED STATES OF AMERICA, Case No. 18-cr-20495

6
7 Plaintiff

Judge David Lawson

8
9 V:

10 IBRAHEEM MUSAIBLI,
11

12 Defendant
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Motion To Dismiss
Indictment on All
Counts for Failure
to State a Cause
of Action and for
Want of Jurisdiction

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17 Now comes the Defendant IBRAHEEM
18 MUSAIBLI, *pro se*, moving the United States
19 District Court (USDC) Judge DAVID LAWSON
20 to DISMISS the Indictment on All Counts
21 for the UNITED STATES OF AMERICA ("U.S.")
22 Failure to State a Cause of Action and for
23 Want of Jurisdiction:
24

25 I. Want of Jurisdiction. Claim defense,
26 Patriot Act Jurisdiction MUST originate
27 from the U.S. Constitution, the U.S. Law

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30 Enforcement Officers, ~~may~~ Principal or
31 Agent, CANNOT charge an U.S. Citizen
32 with an Offense Overseas, NOT on U.S. Soil
33 [e.g., Land, Air or Water (LAW)], without
34 lawful Jurisdiction to lawfully enforce
35 Jurisdiction. IBRAHEEM MUSABLI is a
36 Muslim Arab Native ("MAN") born
37 American citizen falsely charge with
38 terrorist crimes OVERSEAS without
39 material evidence of damage cause
40 to any person, place, or thing as
41 proof(s) offered to state a meritorious
42 claim. Admiralty Law / Civil Law /
43 International Law / Merchantile Law /
44 Law of the Sea / Black's Law Dictionary,
45 7th Ed. (Abridged), Admiralty, p. 38
46 (2000), ISBN: 0-314-24077-2 ("Admiralty
47 (ad-mə-rəl-tee), n. 1. "... court...
48 jurisdiction' over all... contracts, torts,
49 injuries, or offenses. The federal courts
50 are so called when exercising their
51 jurisdiction, which is conferred by the
52 U.S. Constitution (art. III, Sec. 2, cl. 1). —
53 Also termed admiralty court; maritime
54 court. 2. The system of jurisprudence that

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57 has grown out of the practice of
58 admiralty courts; MARITIME LAW.59 3. Narrowly, the rules governing
60 contract, tort, and worker's
61 compensation claims arising out of
62 commerce on or over water [i.e.,

63 OVERSEAS]. — Also termed (in senses

64 2 & 3) admiralty law. — admiralty,
65 adj. "). Without material evidence66 of damage cause to any person, place
67 or thing, proof(s) offered to state

68 a meritorious claim. The Indictment

69 alleged offense, at law, logical positivism

70 is NOT a "controversy: 1. A disagreement

71 or a dispute, esp. in public. 2. A justiciable

72 dispute. 3. Constitutional law. A case

73 that requires a definitive determination

74 of the LAW on the facts alleged for the

75 adjudication of an actual dispute, and

76 not merely a hypothetical, theoretical,

77 or speculative legal issue. — Also termed

78 (in senses 2 & 3) actual controversy.

79 See CASE-OR-CONTROVERSY REQUIREMENT. "Id.,

80 at p. 268. IBRAHEEM MUSAIBLI is actually

81 innocent, and CANNOT be guilty without

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lawful Jurisdiction; damage of any person, place or thing, or actual controversy. The U.S. Law Enforcement Officers know the U.S. constitutional law, but intentionally corrupt the U.S. constitutional law cause judicial activism. Holy Bible (KJV), Matthew 26:14-16 (Judas); Holy Quran (Maulana Muhammad Ali Translation), Al 'Imrān (English: The Family of Amran) 3:60, 3:65 ("This is the truth from the Lord, so be not of the disputers.... O People of the Book, why do you dispute about Abraham, when the Torah and the Gospel were not revealed till after him? Do you not understand?") Amen. IBRAHEEM MUSAI BLI moves the USDC Judge DAVID LAWSON to DISMISS the Indictment on All Counts for the U.S. Failure to State a Cause of Action and for Want of Jurisdiction.

2. Jurisdiction & Due Process.

IBRAHEEM MUSAI BLI Moves To Dismiss All Charges For Wanton Incapacitation to Afford U.S. Constitution, Amendment 5 (1791) (Due Process Clause) and Amendment 14 (1868)

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111 (Due Process Clause & Equal Protection Clause)
112 Protection of the Rights of, IBRAHEEM MUSAIBLI,
113 An U.S. Citizen To Answer For A Capital, Or
114 Otherwise Infamous Crime on Foreign
115 Allegations without Lawful Access to Foreign
116 Personal Witnesses, Foreign Material Evidence,
117 or Foreign Documents and Foreign Intelligence
118 Information even, In Camera Review, by An USDC
119 Judge Under Shadow Of Law National Security
120 Act (1947) or Letters Rogatory To Give The
121 U.S. Citizen in the Case, at bar, A Fair Trial.
122 Speedy Trial Act (1974), Title 18 United States
123 Code, Section 3161-3174 (establishing time
124 limits for carrying out the major events
125 (such as information, indictment,
126 arraignment, and trial commencement)
127 in the prosecution of federal criminal cases).
128 For the record, IBRAHEEM MUSAIBLI was
129 tortured to give U.S. Law Enforcement
130 statements, and the Assistant Federal
131 Defender James Gerometta would not
132 "spend time discussing the contents of [this
133 motion]" October 19, 2021, was his response
134 to the 8 October 2021 Re: Request for Effective
135 Assistance of Counsel (Acronym: "CARE").

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138 IN GOOD FAITH,

139 *Ibraheem Musaiibli*

140 11-10-2021

141 IBRAHEEM MUSAIBLI, prose Date

142 Reg. No. 56787-039

143 FDC Milan

144 POB 1000

145 Milan, MI 48160

146

147 Proof of Service

148

149 I, IBRAHEEM MUSAIBLI, do solemnly swear
150 to have mailed the Attorney General Merrick
151 Garland, Attorney James Gerometta, and USDC
152 Judge David Lawson, a true and correct copy of
153 the Motion To Dismiss:

154

155 A.G. Garland

Clerk of the Court

156 c/o USA Office E. Dist. MI.

USDC Judge David Lawson

157 211 W. Fort ST.

831 W. Lafayette BLVD.

158 Suite 2001

Room 564

159 Detroit, MI 48226

Detroit, MI 48226

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162 Attorney James Gerometta
163 Federal Community Defender
164 613 Abbott Street, Suite 500
165 Detroit, Michigan 48226
166

167 U.S. Postage, First Class Mail, prepaid by way
168 of USPS this Tue. day, date of 9, Nov., 2021.
169

170 IN GOOD FAITH,

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Ibraheem

11-9-2021

173

IBRAHEEM MUSAIBLI, prose

Date

FEDERAL COMMUNITY DEFENDER

Eastern District of Michigan

613 Abbott Street, Suite 500

Detroit, Michigan 48226

Telephone: (313) 967-3542 ■ Facsimile: (313) 962-0685

MICHAEL CARTER
Executive Director/Chief Counsel

JAMES GEROMETTA
Assistant Federal Defender
(313) 967-5839

October 19, 2021

LEGAL MAIL - CONFIDENTIAL

Ibraheem Musaibli
Reg No 56787-039
FDC Milan
PO Box 1000
Milan, MI 48160

Re: *United States of America v. Ibraheem Musaibli*

Ibraheem:

I am in receipt of your letter dated October 8, 2021. Per your request I am submitting this written response to you acknowledging receipt. I will not spend time discussing the contents of your letter, which could be characterized as nonsense. We have spent many hours with you discussing your case, trial strategy and the legal and factual hurdles in mounting a defense. In the event we lose, please feel free to submit this letter as evidence that I was advised of, but failed to file, a "Motion to Dismiss All Charges for Wanton Incapacitation . . ."

One of us will see you soon to keep preparing for trial

Sincerely,

FEDERAL COMMUNITY DEFENDER

/s/ James Gerometta
Assistant Federal Defender

stamps on envelope back

Abraheem Musqibli

NAME

56787-039

REG. NO.

FEDERAL CORRECTIONAL INSTITUTION

P.O. BOX 1000

MILAN, MICHIGAN 48160

clerk of the Court

USDC Judge David Lawson

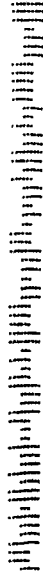
831 W. Lafayette BLVD.

Room 564

Detroit, Michigan 48226

"Legal Mail"

482263001 0004



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NOV 29 2021

CLERKS OFFICE
U.S. DISTRICT COURT



11/12/21

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